

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:     Derrick Deron Robbins  
           Angie Blockmon Robbins, Debtors**

**Case No. 22-00340-JAW  
           CHAPTER 13**

**RESPONSE**

COME NOW, Debtors, by and through counsel, and respond to Trustee's Motion to Dismiss (Dk #49) as follows:

1. Debtors commenced this case on 02/24/2022 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtors can continue making the plan payments.

WHEREFORE, Debtors pray for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By:     /s/ Thomas C. Rollins, Jr.  
          Thomas C. Rollins, Jr. (MSBN 103469)  
          Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.